

McKOOL SMITH

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April 7, 2025

By ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street, Room 2270
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

Jointly on behalf of Plaintiffs-Counterclaim Defendants Matthew Stein and Jerome Lhote and Counterclaim Defendant Luke McGee, we respectfully submit this letter to seek the Court's approval of the manner in which certain Witness Statements and Exhibits filed today were filed in redacted form.

First, we redacted the Settlement Agreement, Letter Agreement, and Affidavits of Confession of Judgment in the manner previously approved by the Court. *See generally* ECF Nos. 46-47.

Second, we redacted names of persons or entities that were previously permitted to be redacted from the Settlement Agreement and Letter Agreement in the handful of documents in which those names appeared.

Finally, we redacted financial account numbers, dates of birth, Social Security numbers or similar identifying numbers, and home addresses.

The exhibits that contains some redactions are Exhibits 3, 6, 9, 10A, 12, 14, 27, 104, 108-09, 121, 124, 129, 201-13, 304, 403, and 404.

The one Witness Statement that contains some redactions is that of Matthew Stein.

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We submit that the very modest redactions proposed by Stein, Lhote, and McGee are consistent with *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119 (2d Cir. 2006), and request that the Court approve these redactions by so ordered this letter.

Because the unredacted materials are too voluminous to e-mail to the Court and at the suggestion of your Honor's law clerk, we have arranged to have a thumb drive containing all materials in unredacted form hand-delivered to the Court together with two paper copies of all materials in unredacted form.

Respectfully submitted,

/s/

Daniel W. Levy

cc: All Counsel (by ECF)

Plaintiffs-Counterclaim Defendants' proposed redactions are approved.

SO ORDERED.

NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Date: April _____, 2025
New York, New York